NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
FACT SHEET
(Pursuant to NAC 445A.236)

Permittee Hallier Properties LLC
4230 S Decatur Blvd Ste 200
Las Vegas NV 89103

Permit No. NV0023558

Facility Panorama Towers III
4471 Dean Martin Dr
Las Vegas NV 89103
Just west of I-15, between W Tropicana Ave and W Flamingo Rd, at the intersection of Dean Martin Dr and Harmon Ave
Clark County
Latitude: 36° 06' 31.32" N
Longitude: 115° 10' 52.68" W
T21S R61E S20

General Plans for Panorama Towers III include an underground parking garage that will extend down into the shallow aquifer. To prevent a nuisance condition, groundwater will be intercepted by perforated pipe placed below the floor, collected in two sumps, then periodically pumped to the adjacent storm drain at an estimated flow rate of 15 gpm. The discharge is untreated based on a lack of contamination. The project is under construction and the site is being dewatered via caissons under temporary permit TNEV2007424, and TNEV2007316 before that. One caisson may be left in place for continual dewatering of that area, under this permit.

Receiving Water Characteristics The storm drain discharges to a tributary of Las Vegas Wash, and the standards set at the nearest downstream control point, "Las Vegas Wash at Telephone Line Road" (NAC 445A.199), apply. In addition, the state wide standards for toxic materials, NAC445A.144, are applicable, and Total Maximum Daily Loads (TMDLs) for Las Vegas Wash have been established for total phosphorus and ammonia.

Rational for Permit Requirements The monitoring requirements and limits are given in Table I.A.1 of the permit, which is presented below.

Table I.A.1 Discharge Limitations

Parameter mg/l except as noted		**Discharge Limitations**	**Monitoring Requirements**	
			Measurement Frequency	Sample Type
Flow rate [1], gpd		m & r	continuous	meter
TPH (C6 - C36)		1	quarterly	discrete
EPA 8260 · Full Range · Report All Parameters · µg/l	Total Trihalomethanes	100	monthly	discrete
	Trichloroethene (TCE)	5	monthly	discrete
	Tetrachloroethene (PCE)	5	monthly	discrete
	MTBE [2]	20	monthly	discrete
	Benzene	5	monthly	discrete
	Toluene	100	monthly	discrete
	Ethylbenzene	100	monthly	discrete
	Xylenes (total)	200	monthly	discrete
Nitrogen Species as N	Total Inorganic Nitrogen	20	quarterly	discrete
	NH3	m & r	quarterly	discrete
	NO2	m & r	quarterly	discrete
	NO3	m & r	quarterly	discrete
Total Phosphorus		m & r	quarterly	discrete
pH, standard units		6.5 to 9	quarterly	discrete
TDS		m & r	quarterly	discrete
Metals [3]		m & r	annual	discrete

Notes
1. Report average gpd for each month
2. Methyl tert-butyl ether
3. Analyses shall include antimony, arsenic, barium, beryllium, boron, cadmium, calcium, chromium, copper, fluoride, iron, lead, magnesium, manganese, mercury, molybdenum, nickel, selenium, silver, thallium, zinc, and hardness as calcium carbonate. Analyses shall be for total metals.

The results discussed below are based on 30 weekly and 7 monthly samples collected under the temporary permits, from August 2006 through April 2007. The weekly samples were analyzed for organics via EPA methods 8260 and 8015, and the monthly samples were analyzed for nutrients, metals, and other inorganics.

FLOW , monitor & report: Flow data is necessary for determining impacts to the receiving waters from the various constituents present. The flow rate is estimated to be 15 gpm (21,600 gpd).

TOTAL PETROLEUM HYDROCARBONS (TPH), 1 mg/l: This technology based limit is included as a precaution against migration of any on or off site organic contaminants to the capture zone of the dewatering system. TPH was detected one time, in the third sample, at 0.38 mg/l, oil range.

EPA 8260 (full range), monitor and report: Similar in purpose to the TPH analysis described above, but with much lower detection limits. This will include the other organic parameters in the table, which are described further below. As discussed, chloroform and PCE are consistently present at low concentrations - the source is unknown, and the site is currently being evaluated under the Corrective Actions program. Based on this, and the fact that the discharge is untreated, the sampling frequency has been set at monthly.

- TOTAL TRIHALOMETHANES, 100 µg/l: This is the toxics standard for the municipal or domestic supply beneficial use. Chloroform, a trihalomethane, was detected 28 times, with a maximum concentration of 1.2 µg/l. No other trihalomethanes were detected.

- TRICHLOROETHENE (TCE), 5 µg/l: This is the toxics standard for the municipal or domestic supply beneficial use. TCE was detected once, in the first sample, at 0.69 µg/l.

- TETRACHLOROETHENE (PCE), 5 µg/l: This is the Maximum Contaminant Level (MCL) for drinking water. With one exception, PCE was detected 20 times, with a maximum concentration of 1.80 µg/l. The exception was a value of 7.8 µg/l for the February 27 sample. After that, 5 subsequent samples yielded non-detect, 0.54, 0.87, non-detect, and 0.54 µg/l. The cause of the excursion is unknown.

- METHYL TERT-BUTYL ETHER (MTBE), 20 µg/l: This is a risk based limit developed under the Corrective Action program, based on taste and odor considerations. MTBE was not detected.

- BENZENE, 5 µg/l: This is the toxics standard for the municipal or domestic supply beneficial use. Benzene was not detected.

· TOLUENE, 100 µg/l: Toluene is methyl benzene. This technology based limit is used instead of the toxic standard (14,300 µg/l) since it's easily achievable. Toluene was detected once at 1.5 µg/l.

· ETHYLBENZENE, 100 µg/l: This technology based limit is used instead of the toxic standard (1,400 µg/l) since it's easily achievable. Ethylbenzene was not detected.

· XYLENES (TOTAL), 200 µg/l: This is a technology based limit. Total xylenes consist of the three isomers of dimethyl benzene. Xylenes were detected twice, at 2.29 and 2.4 µg/l.

NITROGEN SPECIES AS N:

· TOTAL INORGANIC NITROGEN (TIN), 20 mg/l: This limit is taken from the control point standards, and is based on existing water quality. Total inorganic nitrogen is determined from the sum of separate analyses for nitrate, nitrite, and ammonia; the occurrence of those forms is discussed below.

· AMMONIA, monitor & report: This is included due to the TMDL. Ammonia was detected four times; at 0.15, 0.25, 0.29, and 0.11 mg/l. The TMDL is 970 lb/day; at 0.29 mg/l and 15 gpm, the contribution from this source would be 0.052 lb/day.

· Nitrite (NO2), monitor & report: This is included since it's part of the TIN analysis. Nitrite was detected two times, at 1.2 and 1.9 µg/l

· Nitrate (NO3), monitor & report: This is included since it's part of the TIN analysis. Nitrate was detected in every sample, with an average of 12.3 mg/l.

TOTAL PHOSPHORUS, monitor & report: This is included due to the TMDL. Total phosphorus was detected three times, with a maximum concentration 0.27 mg/l. The TMDL is 434 lb/day; at 0.27 mg/l and 15 gpm, the contribution from this source would be 0.049 lb/day.

pH, 6.5 - 9.0, standard units: This is the control point standard, based on beneficial uses. Reported values range from 7.3 to 7.6 s.u.

TDS, monitor & report: The average concentration is 2114 mg/l. The control point standard is 1900 mg/l, based on existing quality. This

parameter is not limited based on natural occurrence and difficulty of treatment.

METALS, monitor & report: Several metals have been found at concentrations in excess of criteria, as shown in the table below. These parameters are not limited based on natural occurrence and difficulty of treatment.

Occurrence of Metals in Exess of Water Quality Criteria

Discharge Characteristics			Water Quality Standards NAC 445A.144	
Constituent mg/l	No. of Detections [1]	Average Concentration	Criteria	Beneficial Use
As	4	0.096	0.05	municipal or domestic supply
Fe	3	3.56	1	aquatic life
Se	4	0.073	0.005	aquatic life
F	1	1.4	1	irrigation

1. 7 samples were analyzed

Procedures for Public Comment Notice of the Division's intent to issue discharge permit NV0023558, authorizing a dewatering discharge to the storm drain at Panorama Towers III, is being sent to the Las Vegas Review Journal for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit must submit written comments to the Division within (30) days of the publication date. The comment period can be extended at the discretion of the Administrator. The deadline for comments is 5:00 P.M. Tuesday August 21, 2007, although letters postmarked on that date will also be accepted.

A public hearing on the proposed determination can be requested by the applicant, any affected state or interstate agency, the Regional Administrator, or any interested agency, person, or group of persons. The request must be filed within the comment period and indicate the interest of the person filing the request and the reasons why a hearing is warranted. Public hearings granted by the Division are conducted in accordance with NAC 445A.238.

The final determination of the Division may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination The Division has made the tentative determination to issue the proposed discharge permit for a five year term.

Prepared by: Robert J. Saunders
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Bureau of Water Pollution Control
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